



BOULT • CUMMINGS  
CONNERS • BERRY PLC

REC'D TN  
REGULATORY AUTH.

Jon E. Hastings  
(615) 252-2306  
Fax: (615) 252-6306  
Email: jhastings@boultcummings.com

April 10, 2002 APR 11 AM 10 00

OFFICE OF THE  
EXECUTIVE SECRETARY

Mr. David Waddell  
Executive Secretary  
Tennessee Regulatory Authority  
460 James Robertson Parkway  
Nashville, Tennessee 37243

Re: Petition of WorldCom, Inc. and Intermedia Communications, Inc.  
For Approval of Customer Notice Letter Pursuant to  
TRA Rule 1220-4-2-.56(2)(d)(2)

Dear Mr. Waddell:

Attached please find the Petition of WorldCom, Inc. and Intermedia Communications, Inc. For Approval of Customer Notice Letter Pursuant to TRA Rule 1220-4-2-.56(2)(d)(2) which we would appreciate your noting filed with the Tennessee Regulatory Authority.

Thank you for your assistance in this matter.

Very truly yours,

BOULT, CUMMINGS, CONNERS & BERRY, PLC

By:

*Jon Hastings*  
Jon E. Hastings

JEH/th

Attachments

**BEFORE THE TENNESSEE REGULATORY AUTHORITY  
AT NASHVILLE, TENNESSEE**

<b>Petition of</b>	)	
	)	
<b>WorldCom, Inc.</b>	)	
	)	
<b>and</b>	)	<b>Docket No.</b>
	)	
<b>Intermedia Communications, Inc.</b>	)	
	)	
<b>For Approval of Customer Notice Letter</b>	)	
<b>Pursuant to TRA Rule 1220-4-2-.56(2)(d)(2)</b>	)	

**PETITION**

WorldCom, Inc. ("WorldCom") and its subsidiary, Intermedia Communications, Inc. ("Intermedia") (collectively "Petitioners"), by their undersigned counsel, hereby seek approval from the Tennessee Regulatory Authority ("Authority") of the attached customer notice letter being sent to Intermedia's residential long distance customers pursuant to TRA Rule 1220-4-2-.56(2)(d). *See* Attachment 1. As explained below, this customer notice is being sent in connection with an intra-corporate transition of Intermedia's residential long distance customers to its affiliate, MCI WorldCom Communications, Inc. ("MCI WorldCom"). Pursuant to TRA Rule 1220-4-2-.56(2)(d), Petitioners will be submitting in the near future a separate petition for approval to transition Intermedia's residential long distance customers to MCI WorldCom. However, so that Petitioners can meet their May 15, 2002 deadline for mailing the attached notice letter to affected customers, Petitioners submit this Petition for approval of the notice letter and request the Authority to expeditiously grant such approval. Petitioners submit the following in support of this Petition:

## **I. BACKGROUND**

By letter dated September 21, 2001, WorldCom notified the Authority that it had determined not to sell the regulated telecommunications operations of Intermedia, in Tennessee, which WorldCom had acquired as of July 1, 2001 pursuant to the Authority's order approving the transfer dated March 22, 2001 in Docket No. 00-01099. As WorldCom indicated to the Authority in its earlier filings on the status of the transaction, the Intermedia operations have continued to operate since the WorldCom acquisition under the existing Intermedia certificates and tariffs. At the same time, WorldCom has evaluated whether and how it will consolidate the Intermedia operations into the existing operations of other WorldCom operating subsidiaries or otherwise make changes to the existing Intermedia business plan.

As part of this evaluation WorldCom advised the Authority on December 21, 2001, of its plans to transition Intermedia's business long distance customers to comparable service plans offered by MCI WorldCom. The Authority approved this partial transfer of Intermedia's customer base pursuant to its Order dated February 20, 2002 in Docket No. 02-00054. As stated in earlier filings with the Authority, WorldCom is committed to keeping the Authority apprised of the results of WorldCom's evaluation and any plans to consolidate certain Intermedia services with other WorldCom subsidiaries. Accordingly, at this time, WorldCom advises the Authority that it has determined that it also is appropriate to transition Intermedia's residential long distance customers to comparable service plans offered by MCI WorldCom.

## **II. DESCRIPTION OF TRANSACTION AND CUSTOMER NOTICE**

As noted above, WorldCom has determined that it is necessary to migrate the residential long distance customers of its subsidiary Intermedia to another WorldCom operating subsidiary

MCI WorldCom. This Petition seeks approval of the attached customer notice letter to be sent in connection with this intra-corporate customer transfer. Approximately 30 residential long distance subscribers in Tennessee will be affected by this transition. These customers receive long distance, calling card and 800 services. Because the affected Intermedia subscribers will be transitioned to another WorldCom operating subsidiary with a new name and with somewhat different rate plans, WorldCom has developed a customer notification and transfer plan that is intended to assure informed customer choice and seamless transition to MCI WorldCom service. However, in the event that a customer elects not to make the change, WorldCom will also assure that any customer who so chooses can transfer to another carrier without any interruption of service.

Specifically, WorldCom will provide customers with notice of the change from Intermedia to its affiliate MCI WorldCom to assure that customers are fully informed of the change. The affected customers will be notified by letter, in the form attached as Attachment 1 hereto, that advises them that:

- WorldCom will provide the customer with the same or better high quality telecommunications services as it received from Intermedia;
- WorldCom will reimburse the transferred customers for any primary carrier change charges if they are imposed by the customers' local exchange carrier in connection with the change from Intermedia to MCI WorldCom;
- in the event that the customer prefers to use another company as its long distance carrier, it has the right to switch to another carrier of its choice; and
- the customer may contact WorldCom at a toll-free number with any questions regarding the transfer of their service.

The attached notice letter is similar to the letter submitted to Intermedia's business long distance customers in connection with the transition of those customers to MCI WorldCom and approved by the Authority on February 20, 2002.

WorldCom plans to send the attached notice to affected customers on May 15, 2002. The migration of customers to MCI WorldCom service is expected to take place on or after July 1, 2002. In connection with this process, WorldCom will comply with TRA rules and regulations governing the transfer of long distance carriers, including TRA Rule 1220-4-2-.56. As indicated above, a separate petition will be submitted for approval of the customer transfer.

### **III. CONTACT INFORMATION**

The designated contacts for questions regarding this Petition are:

Jon E. Hastings  
Boult Cummings, Conners & Berry PLC  
414 Union Street, Suite 1600  
Nashville, TN 37219  
(615) 252-2306 (Tel)  
(615) 252-6306 (Fax)

and,

Jean L. Kiddoo  
Kathy L. Cooper  
Swidler Berlin Shereff Friedman, LLP  
3000 K Street, N.W., Suite 300  
Washington, D.C. 20007  
(202) 424-7834 (Tel)  
(202) 424-7645 (Fax)

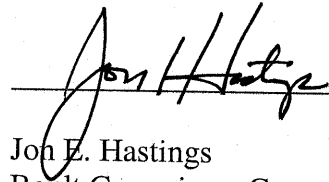
with a copy to:

Marsha Ward  
WorldCom, Inc.  
6 Concourse Parkway  
Atlanta, Georgia 30328  
(770) 284-5490 (Tel)  
(770) 284-5488 (Fax)

#### IV. CONCLUSION

For the reasons stated above, Petitioners request approval from the Authority of the attached customer notice letter in connection with the intra-corporate transition of Intermedia's residential long distance customers to its affiliate, MCI WorldCom. Petitioners request that the Authority expeditiously grant such approval so that Petitioners can send the attached notice letter to affected customers no later than May 15, 2002.

Respectfully submitted,

A handwritten signature in black ink, appearing to read "Jon E. Hastings", is written over a horizontal line.

Jon E. Hastings  
Boult Cummings, Conners & Berry PLC  
414 Union Street, Suite 1600  
Nashville, TN 37219  
(615) 252-2306 (Tel)  
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(202) 424-7834 (Tel)  
(202) 424-7645 (Fax)

Counsel for Petitioners

Dated: April 10, 2002

**ATTACHMENT 1**  
Sample Residential Customer Notice Letter



Karen White  
701 South 12th Street  
Arlington, Va. 22202  
BAR CODE

Call MCI at 1-800-249-6484 to select the domestic and international calling plans that best meet your needs.

Customer Telephone Number:

Dear Intermedia Customer,

As you may know, merger activities between Intermedia Communications Inc. and WorldCom, Inc. were finalized last year. As a result, Intermedia will no longer serve as your residential long distance carrier. To ensure that you receive the highest level of service at the greatest value without interruption, we will convert your service to another WorldCom Company, MCI, on XX/XX/02 or soon thereafter, unless you choose a provider as discussed below. MCI will begin providing you with state-to-state and in-state long distance, local toll, calling card, 800 and international services to satisfy your telecommunication needs. Residential customers with 800 number service will receive a new 800 number and personal identification number to be used with MCI.

MCI invites you to call a Customer Service Representative to make the switch prior to xx/xx/xx, and to select a domestic and international calling plan of your choice. Your local phone company may impose a switching fee, however, MCI will reimburse you for this fee on your first MCI bill. You can call MCI at 1-800-249-6484, representatives are available Monday through Saturday, 7:00 a.m.-10:00 p.m. (EST). If you subscribe to a service from your local phone company that limits changes to your long distance carrier selection, (this service is often referred to as a "freeze"), please contact your local phone company to remove this service before you contact MCI.

You're under no obligation to select MCI as your long distance carrier. You may select another company to handle your long distance calls. Should you decide not to use MCI, you'll need to contact a replacement carrier or your local phone company, prior to XX/XX/XX.

If you choose not to call MCI or another long distance carrier prior to xx/xx/xx, you will automatically be placed on MCI's calling plan, MCI® Anytime Access(sm). This domestic calling plan offers the following:

- 12¢ per minute on ALL state-to-state calls from home, 24 hours a day, 7 days a week
- Competitive Local Toll and In-state long distance rates\*
- No Monthly Plan Fee
- International Calling Plans Available
- \$5.00 Monthly Minimum
- Personal 800 Number
- Credit Card Billing Available
- Competitive Calling Card Rates

If you are a part of the automatic transfer from Intermedia to MCI, your long distance calls will be completed by MCI whenever you dial 1+ from your telephone line. In addition, MCI will pay any change fee imposed by your local service carrier. And, MCI will become your long distance carrier regardless of any "freeze" on your account. However, you may need to contact your local service carrier to institute a new "freeze". Upon completion of the automatic transfer, you will receive a welcome packet outlining all of your new MCI services.

If you have any questions regarding the transfer from Intermedia to MCI, please call 1-800-249-6484. If you have questions regarding the service received from Intermedia, please contact an Intermedia representative at 1-800-250-9999.

If MCI's Direct Dial or Dial 1 rates change in the future, you will be notified by a message either on your invoice, by letter or postcard, by calling and speaking to you, leaving a message for you, or by e-mail, with your consent. You may receive advance notice of other changes and our terms and conditions by visiting our website at [www.mci.com/service](http://www.mci.com/service). If you've already switched your long distance service from Intermedia, please disregard this letter.

Sincerely,

Jim Myers  
MCI, Vice President, Customer Service

State-to-state and international charges exclude Federal Universal Service Fee. Additional state-specific fees may apply.

\*In-state long distance rates range from \$.07 to \$.14 per minute, please see [www.mci.com/service](http://www.mci.com/service) or call customers service for the rates in your state.